




Alternative Request Proposal Form	At what stage is this document in the process?
<h1 data-bbox="167 392 1077 488">GC0132:WAGCM3</h1> <p data-bbox="167 526 1013 884"><b>Mod Title:</b> Updating the Grid Code governance process to ensure we capture EBGL change process for Article 18 Terms and Conditions (T&amp;Cs)</p>	<div data-bbox="1152 340 1452 533"><div data-bbox="1152 340 1225 421">01</div><div data-bbox="1235 340 1452 421">Proposed Workgroup Alternative</div><div data-bbox="1152 443 1225 533">02</div><div data-bbox="1235 443 1452 533">Formal Workgroup alternative</div></div>
<p data-bbox="167 985 1436 1160"><b>Purpose of Alternative:</b> To apply a single updated and compliant process to all code modifications making which will be simpler and avoid future errors (as per WAGCM1) and ensure a consistency in application of the Article 10(6) justification powers by the industry code Panels.</p>	
<p data-bbox="156 1317 837 1355"><b>Workgroup vote outcome:</b> <i>Formal alternative</i></p>	

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## 1 Alternative proposed solution for workgroup review

The BSC equivalent change proposal (P392) solution being taken forward in the BSC means that the powers set out in Article 10(6); “a sound justification for including or not including the views resulting from the consultation shall be provided” is exercised not by the TSO but by the code Panel. This WAGCM would permit that approach to be utilised (along with WAGCM1) in the Grid Code, which ensures a consistency across the industry codes.

## 2 Difference between this proposal and Original

### WAGCM3 Changes from WAGCM1:

All legal text for WAGCM3 is the same as WAGCM1 apart from amendments to GR.18.9, 22.2(l) and 22.2(m) and the Regulated Sections definition as below where highlighted:

GR.18.9      The **Grid Code Review Panel** shall evaluate each **Grid Code Modification Proposal** and determine whether the **Grid Code Modification Proposal** constitutes an amendment to the **Regulated Sections** of the Grid Code **(and in the event of disagreement The Company's view shall prevail).**

GR22.2(l) the **Grid Code Review Panel's** ~~The Company's~~ sound justification for including or not including the views resulting from the relevant consultation in the **Grid Code Modification Report** taking into account the objectives and recitals of **European Regulation (EU) 2017/2195**.

GR.22.2(m) where a **Grid Code Modification Proposal** or any **Workgroup Alternative Grid Code Modification(s)** constitutes an amendment to the **Regulated Sections**, the expected impact on the objectives **or recitals** of **European Regulation (EU) 2017/2195**.

<b>Regulated Sections</b>	Parts of the Grid Code that are referenced in <b>Governance Rules Annex GR.B</b> as amended from time to time with the approval of the <b>Authority</b> and where relevant in accordance with the process set out in Articles 4, 5, 6 and 10 of <b>European Regulation (EU) 2017/2195</b> .
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### 3 Justification for alternative proposal against Grid Code objectives

#### Impact of the modification on the Applicable Grid Code Objectives:

Relevant Objective	Identified impact
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	Neutral
(b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	Neutral
(c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;	Neutral
(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity	Positive

Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and	
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive

This alternative will be more efficient than WAGCM1 as it will ensure a consistency in approach to the application of the Article 10(6) powers by the elected industry Panels in GB, and accords with the justification NGESO has proposed with its equivalent BSC proposal (P392).

## 4 Impacts and Other Considerations

While not directly impacting any other codes, as the EBGL A18 process applies equally to all GB frameworks falling within the T&Cs, so any considerations of a more efficient process should be shared with the CUSC and BSC panels or workgroups also considering these changes for their codes.

### Consumer Impacts

None directly, but in facilitating a more efficient process and in mitigating the risk of future non-compliance some efficiency benefits will be delivered for consumers.

## 5 Implementation

The same implementation requirements apply as per the original proposal.

## 6 Legal Text

The legal text can be located in the zip folder labelled Annex 2. The changes to WAGCM1 required for this alternative are outlined in section 2 of this document.